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GAEA SERVICES, Inc.

OIL, GAS & MINERAL MANAGEMENT

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January 23, 2017

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Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

**RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
Facility ID #1249000**

Dear Mr. Tsirigotis:

On December 8, 2016, my company, GAEA Services, Inc., (GAEA) received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced facility. GAEA has 27 years of operations and is in good standing with all government regulatory agencies. I respectfully request an extension of 60 days to respond to the information collection request ("ICR") for multiple reasons.

Because of the downturn and market conditions we have trimmed our staff to (b) (6) employees and they are responsible for collecting information on (b) (6) wells spread out over 4 counties covering (b) (4) square miles. Much of the information that is being requested by the EPA is not readily available and will require me to travel to the West Texas area to personally to visit each site. The information collection requires me to certify to the accuracy of the information provided to the EPA and subjects me to criminal liability. Also, it is unclear to me how to calculate when the response is currently due because of the holidays. I request that you indicate in your response when the EPA considers the response due.

This ICR fell over the holidays when my small staff was unavailable at various points in time for reasons; all beyond anyone's control. All of my staff, including myself, (b) (6)
(b) (6)

In addition to the complications associated with limited resources, holidays, inclement weather, and personal situations, the timing of the request for this information at the end of the year could not have been worse. We not only have our normal day to day operations, we are now working on year end financial reporting and processes, plus there are other annual reports such as the Tier II Chemical Inventory, monthly Natural Gas and Production reporting, and corporate tax

preparation. Compounding this is the day to day maintenance of the wells. With the limited personnel, I have to balance reporting obligations to the ICR while continuing to ensure operations run in an efficient and environmentally responsible manner. I assure you we are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

I have multiple concerns and several questions pertaining to the Part 1 Survey that I would like clarification on before submitting any incomplete or erroneous information.

- 1) I do not own all the wells that I operate, therefore whose responsibility is it to respond when the operator is different than the owner?
- 2) The wells I operate have more than one owner. Whose responsibility is it to respond when there is more than one owner?
- 3) All of our gas/oil is "produced" for "sales." When would the answer to questions in Sections 3 and 4 be "no"? The way the questions are presented has me confused.
- 4) I may have tanks on site that we commonly refer to as "gun barrels." I do not consider them "separators" but they do separate some gas/oil from water. How does EPA view this equipment?
- 5) Is the "surface site ID" in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?]

In conclusion, due to holidays, inclement weather, personal issues (b) (6) end of the year reporting obligations and 2016 tax preparation, I respectfully ask that you provide a 60 day extension and clarification of questions. Please contact me if you have any questions and I look forward to hearing from you.

(b) (6)

John David Patterson
President

cc: Ms. Brenda Shine

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